

EXHIBIT M

TO

PLAINTIFF'S PETITION

FOR ATTORNEYS' FEES

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

**RONNIE GILES,
PLAINTIFF,**

V.

**CIVIL ACTION NO:
3:06-cv-00528-WKW-VPM**

**MASTERBRAND CABINETS, INC.,
DEFENDANT.**

DECLARATION OF ALLEN D. ARNOLD

COMES NOW Allen D. Arnold, who first duly acknowledges that she is declaring under penalty of perjury, deposes and states as follows:

- I. My name is Allen D. Arnold. I am an attorney practicing in Birmingham, Alabama. I am the associate attorney of record for plaintiff Ronnie Giles in this case. I make this declaration in support of my Motion for an Award of Attorney's Fees.
- II. The fee itemization which is submitted in connection with this fee application consists of true and accurate records which I kept contemporaneously with the work expended.
- III. Based on my experience in the area of employment law in both the trial and appellate courts, the amount of time expended by me was reasonable. I have avoided seeking payment for undue duplication of time or effort. I have avoided seeking reimbursement for time spent researching and preparing

responses to the defendant's post-trial motions because this Court ruled on those motions prior to me filing any responsive pleadings. I seek reimbursement for 111.4 hours of attorney time. (See Exhibits F, H, & K to Plaintiff's Petition for Attorneys' Fees).

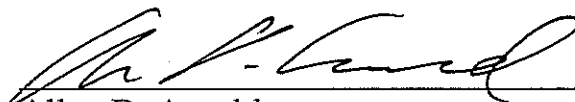
- IV. The applicable current rate for my legal services appropriate to the local market as of the date of this Application is \$235 per hour.
- V. The qualifications of the undersigned are as follows:
 - A. Counsel for the plaintiff graduated with honors from the Stetson University College of Law in 2004, and was admitted to the Alabama State Bar in 2004.
 - B. Counsel for the plaintiff practices not only in state court, but also before the United States District Court for the Northern District of Alabama, United States District Court for the Middle District of Alabama, and the United States Court of Appeals for the Eleventh Circuit.
 - C. Since 2004, counsel for the plaintiff has focused his practice of law on the area of civil rights litigation. He currently represents plaintiffs in employment related cases, but has represented some small businesses for defense purposes. Counsel for the plaintiff has tried two jury trial cases before the United States District Court for the Northern District

of Alabama and one jury trial in the Middle District of Alabama since 2004.

VI. The services required and provided in the current case included, in my opinion, the following: (1) organization and efficiency in the marshaling of facts, evidence and theories of liability so that false starts or wasted efforts were minimized; (2) a thorough comprehension of the substantive and procedural law and policy arguments; (3) case assessment which weeds out unproductive theories and claims, and which concentrates energies on the points which are most likely to prevail; and (4) experience in presenting evidence and theories to the Court. Based on my knowledge of the local market for legal services, these characteristics command the requested hourly for the current case.

FURTHER DECLARANT SAYETH NOT.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this, the 30th of November, 2007.

A handwritten signature in black ink, appearing to read "Allen D. Arnold", written over a horizontal line.

Allen D. Arnold
Counsel for Plaintiff

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